

DAKIN LEE JONES  
Name  
568043  
Prison Number  
Anchorage Correctional Complex East  
Place of confinement  
1400 E 4TH AVE  
Mailing address  
Anchorage, AK 99501  
City, State, Zip  
\_\_\_\_\_  
Telephone

RECEIVED

SEP 14 2023

CLERK, U.S. DISTRICT COURT  
ANCHORAGE, AK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

DAKIN LEE JONES,  
(Enter full name of plaintiff in this action)

Plaintiff,

vs.

Department of Corrections,  
Sgt Blades Co Mack,

\_\_\_\_\_  
(Enter full names of defendant(s) in this action.  
Do NOT use *et al.*)

Defendant(s).

Case No. 3:23-cv-00213-JMK  
(To be supplied by Court)

PRISONER'S  
COMPLAINT UNDER  
THE CIVIL RIGHTS ACT  
42 U.S.C. § 1983  
TORT

**A. Jurisdiction**

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3).

**B. Parties**

1. Plaintiff: This complaint alleges that the civil rights of DAKIN LEE JONES,  
(print your name)  
who presently resides at Anchorage Correctional Complex East,  
(mailing address or place of confinement)

were violated by the actions of the individual(s) named below.

Sgt Blades Co Mack

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, E Sgt Blades is a citizen of Alaska, and is employed as a D.O.C.  
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, Co Mack is a citizen of Alaska, and is employed as a D.O.C.  
(name) (state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☒ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, \_\_\_\_\_ is a citizen of \_\_\_\_\_, and is employed as a \_\_\_\_\_  
(name) (state) (defendant's government position/title)

\_\_\_\_\_ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

\_\_\_\_\_ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

**\*\*\*REMINDER\*\*\***

**You must exhaust your administrative remedies before your claim can go forward.  
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.**

**C. Causes of Action** (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

Claim 1: On or about 3 28 23, my civil right to  
(Date)

Medical care

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by Sgt Blades CO MACK  
(Name of the specific Defendant who violated this right)

**Supporting Facts** (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

I am prone to infections, on or around this date I was in a med and for no reason above Sgt told Co Mack to roll me up and put me in and my helper in the hole for no reason at all in a cell smeared with poo that resulted in a worsened infection that was in my leg when moved and I ended up in the hospital for 7 days and had to have 3 surgeries to get rid of the infections.

**Claim 2:** On or about \_\_\_\_\_, my civil right to  
(Date)

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by \_\_\_\_\_  
(Name of the specific Defendant who violated this right)

**Supporting Facts** (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

**Supporting Facts** (Briefly describe facts you consider important to Claim 3. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 3.):

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

**D. Previous Lawsuits**

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, **or otherwise relating to your imprisonment?** ☐ Yes ☐ No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

Name and location of court: \_\_\_\_\_

Docket number: \_\_\_\_\_ Name of judge: \_\_\_\_\_

Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

Disposition: ☐ Dismissed ☐ Appealed ☐ Still pending

Issues Raised: \_\_\_\_\_

b. Lawsuit 2:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

Name and location of court: \_\_\_\_\_

Docket number: \_\_\_\_\_ Name of judge: \_\_\_\_\_

Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

Disposition: ☐ Dismissed ☐ Appealed ☐ Still pending

Issues Raised: \_\_\_\_\_

3. Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?

☐ Yes ☐ No

If your answer is "Yes," describe each lawsuit on the next page.

**Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:**

- a. Defendant(s): PO Mannon et al
- b. Name of federal court District of Alaska Case number: 3:19-cv-00125 RRB
- c. The case was dismissed as: \_\_\_ frivolous, \_\_\_ malicious and/or \_\_\_ failed to state a claim
- d. Issue(s) raised: I didn't know how to Amend the claim
- e. Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

**Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:**

- a. Defendant(s): \_\_\_\_\_
- b. Name of federal court \_\_\_\_\_ Case number: \_\_\_\_\_
- c. The case was dismissed as: \_\_\_ frivolous, \_\_\_ malicious and/or \_\_\_ failed to state a claim
- d. Issue(s) raised: \_\_\_\_\_
- e. Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

**Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:**

- a. Defendant(s): \_\_\_\_\_
- b. Name of federal court \_\_\_\_\_ Case number: \_\_\_\_\_
- c. The case was dismissed as: \_\_\_ frivolous, \_\_\_ malicious and/or \_\_\_ failed to state a claim
- d. Issue(s) raised: \_\_\_\_\_
- e. Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

**4. Are you in imminent danger of serious physical injury?** \_\_\_ Yes \_\_\_ No

If your answer is "Yes," please describe how you are in danger, without legal argument/authority: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

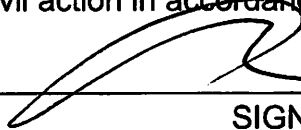
**AUTHORIZATION**

I, DARIN LEE JONES, request and authorize the agency holding me in custody to prepare for the Clerk of the United States District Court for the District of Alaska, a certified copy of the statement for the past six months of my trust fund account (or institutional equivalent) activity at the institution where I am incarcerated.

I further request and authorize the agency holding me in custody to calculate and disburse funds from my trust fund account (or institutional equivalent) pursuant to any future orders issued by the Court relating to this civil action in accordance with 28 U.S.C. § 1915(b).

9 4 23

DATE



SIGNATURE OF APPLICANT

DARIN LEE JONES

COMMITTED NAME OF APPLICANT

(Type or Print)

368043

INMATE NO.

**You *must* include a certified copy of your prison account statement, showing the transactions for the past six months, with this application.**



## F. Request for Relief

Plaintiff requests that this Court grant the following relief:

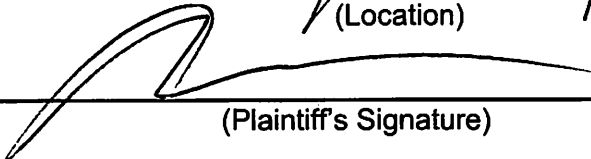
1. Damages in the amount of \$ 2 mil
2. Punitive damages in the amount of \$ 2 mil
3. An order requiring defendant(s) to Be held to accountability
4. A declaration that Any harm or abuse due to my harm they are to be held accountable
5. Other: \_\_\_\_\_

Plaintiff demands a trial by jury. ☒ Yes ☐ No

## DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Anchorage Correctional complex <sup>EAST</sup> on 9 4 23  
(Location) (Date)

  
(Plaintiff's Signature)

\_\_\_\_\_  
Original Signature of Attorney (if any)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Attorney's Address and Telephone Number

DARIN VOON 368043  
Anchorage Correctional Complex East  
1400 East 4th Ave  
Anchorage, AK 99501



quodient  
FIRST-CLASS MAIL  
IM1  
\$002.31<sup>2</sup>  
09/13/2023 ZIP 99501  
043M31237346

US POSTAGE

LEGAL & CONFIDENTIAL

THIS LETTER WAS  
WRITTEN BY  
AN INMATE AT AN ALASKA JAIL  
PLEASE DO NOT SEND CASH IN  
THE MAIL

UNITED STATES DISTRICT COURT  
222 W 7th Ave #4  
Anchorage, AK 99513

THIS LETTER WAS  
WRITTEN BY  
AN INMATE AT AN ALASKA JAIL  
PLEASE DO NOT SEND CASH IN  
THE MAIL

LEGAL & CONFIDENTIAL

